

ORIGINAL

BEFORE THE ARIZONA CORPORATION



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COMMISSIONERS

SUSAN BITTER SMITH, Chairman
BOB STUMP
BOB BURNS
DOUG LITTLE
TOM FORESE

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AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION
OF SULPHUR SPRINGS VALLEY
ELECTRIC COOPERATIVE, INC., AN
ARIZONA NONPROFIT CORPORATION,
FOR (1) APPROVAL OF A NEW NET
METERING TARIFF; (2) APPROVAL OF
REVISIONS TO ITS EXISTING NET
METERING TARIFF; AND (3) PARTIAL
WAIVER OF THE NET METERING
RULES.

DOCKET NO. E-01575A-15-0127

**SSVEC'S NOTICE OF CORRECTION OF
HEADING**

On September 18, 2015, Sulphur Springs Valley Electric Cooperative, Inc. ("SSVEC") filed a response opposing Utilities Division Staff's Motion to Consolidate this docket and Docket No. E-01575A-15-0312, SSVEC's rate case application. The heading on SSVEC's response incorrectly identified the filing as a request for extension of time to respond to Staff's motion. Attached hereto as Attachment 1 is a revised first page to SSVEC's September 18, 2015 response which correctly identifies the filing as SSVEC's Response in Opposition to Staff's Motion to Consolidate. There were no other changes to page 1.

RESPECTFULLY submitted this 21st day of September, 2015.

Arizona Corporation Commission
DOCKETED
SEP 21 2015

DOCKETED BY

CROCKETT LAW GROUP PLLC

Jeffrey W. Crockett, Esq.
1702 East Highland Avenue, Suite 204
Phoenix, Arizona 85016
Attorney for Sulphur Springs Valley Electric
Cooperative, Inc.

1 **ORIGINAL** plus thirteen (13) copies of the
2 foregoing filed this 21st day of September, with:

3 Docket Control
4 ARIZONA CORPORATION COMMISSION
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 **COPIES** of the foregoing hand-delivered
8 this 21st day of September, to:

9 Dwight Nodes, Chief Administrative Law Judge
10 Hearing Division
11 ARIZONA CORPORATION COMMISSION
12 1200 West Washington Street
13 Phoenix, Arizona 85007

14 Janice Alward, Chief Counsel
15 Legal Division
16 ARIZONA CORPORATION COMMISSION
17 1200 West Washington Street
18 Phoenix, Arizona 85007

19 Thomas M. Broderick, Director
20 Utilities Division
21 ARIZONA CORPORATION COMMISSION
22 1200 West Washington Street
23 Phoenix, Arizona 85007

24 **COPIES** of the foregoing sent via e-mail
25 and/or U.S. Mail this 21st day of September, to:

26 Court S. Rich, Esq.
27 ROSE LAW GROUP PC
28 7144 E. Stetson Dr., Suite 300
Scottsdale, Arizona 85251

Mark Holohan, Chairman
ARIZONA SOLAR ENERGY INDUSTRIES ASSOCIATION
2122 W. Lone Cactus Dr., Suite 2
Phoenix, Arizona 85027

Thomas A. Loquvam, Esq.
PINNACLE WEST CAPITAL CORPORATION
PO Box 53999, MS 8695
Phoenix, Arizona 85072-3999

1 Gregory Bernosky
2 ARIZONA PUBLIC SERVICE COMPANY
3 PO Box 53999, MS 9712
Phoenix, Arizona 85072-3999

4 Michael A. Curtis, Esq.
5 William P. Sullivan, Esq.
6 CURTIS, GOODWIN, SULLIVAN
7 UDALL & SCHWAB, PLC
501 E. Thomas Road
Phoenix, Arizona 85012-3205

8 Tyler Carlson, CEO
9 MOHAVE ELECTRIC COOPERATIVE, INC.
10 PO Box 1045
Bullhead City, Arizona 86430

11 Peggy Gillman, Manager of Public Affairs
12 MOHAVE ELECTRIC COOPERATIVE, INC.
13 PO Box 1045
Bullhead City, Arizona 86430

14 Paul O'Dair, Manager of Financial Services
15 NAVOPACHE ELECTRIC COOPERATIVE, INC.
16 1878 W. White Mountain Blvd.
Lakeside, Arizona 85929

17 Charles Moore, Chief Executive Officer
18 NAVOPACHE ELECTRIC COOPERATIVE, INC.
19 1878 W. White Mountain Blvd.
Lakeside, Arizona 85929

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ATTACHMENT 1

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

SUSAN BITTER SMITH, Chairman
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IN THE MATTER OF THE APPLICATION
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RULES.

DOCKET NO. E-01575A-15-0127

**SSVEC'S RESPONSE IN OPPOSITION TO
STAFF'S MOTION TO CONSOLIDATE**

On April 14, 2015, Sulphur Springs Valley Electric Cooperative, Inc. ("SSVEC" or the "Cooperative") filed an application (the "Net Metering Application") in this docket seeking approval of a new Net Metering Tariff Schedule NM-2, revisions to its existing Net Metering Tariff Schedule NM, and a partial waiver of the Arizona Corporation Commission's net metering rules. On August 31, 2015, SSVEC filed a general rate case application in Docket E-01575A-15-0312 (the "Rate Case Docket") requesting, among other things, revisions to the Cooperative's existing Net Metering Tariff Schedule NM, approval of a new Distributed Generation Tariff Schedule DG, and a request for necessary waivers of the Commission's net metering rules. On September 2, 2015, Utilities Division Staff ("Staff") filed a Motion to Consolidate ("Motion") this docket and the Rate Case Docket asserting that "the framework of a rate case better suits addressing the issues raised by the Cooperative in its tariff filing"¹ and suggesting indirectly that Staff's resources should not be expended on two separate proceedings for SSVEC. However, SSVEC filed the Net Metering Application because it must immediately address the serious cost shift that is occurring as a result of the rapid increase customers installing rooftop photovoltaic ("PV") systems pursuant to the Cooperative's existing net metering tariff. SSVEC opposes Staff's

¹ Staff's Motion to Consolidate at 2, lines 14-15.